



already rejected similar arguments in denying 122 motions to strike affirmative defenses. *See, e.g.*, June 26, 2023, Text Order, *Akers v. United States*, Case No. 7:23-cv-00120-BO (“[A]t this stage in the overall Camp Lejeune Justice Act proceedings, the Court will not strike any affirmative defenses at this time.”) (Boyle, J.). Thus, Plaintiff’s Motion for Rule 11 Sanctions is legally incorrect and lacks merit.

In reality, Plaintiff’s Motion for Rule 11 Sanctions constitutes yet another filing seemingly intended to harass or threaten counsel for the United States for taking any legal position other than satisfying his demand for over \$100 million. *See, e.g.*, Motion to Exclude DOJ Attorneys, Dkt. 8; Motion to Exclude Mr. Haroon Anwar, Dkt. 23; Emails from Plaintiff to DOJ Counsel, Dkt.28-1; *see also Matter of Straw*, 68 N.E.3d 1070, 1071 (Ind. 2017) (“The first case, *Straw v. Kloecker*, arose from a defamation lawsuit Respondent had filed on his own behalf against a publishing company. After opposing counsel sought information from Respondent, Respondent sued opposing counsel in federal court, alleging racketeering activity and seeking \$15,000,000 in damages and injunctive relief. The District Court dismissed Respondent’s lawsuit as frivolous.”); *Straw v. U.S. Dep’t of State*, No. 19-cv-2294, 2020 WL 2490022, at \*1 n.1 (D. Md. May 14, 2020) (“A cursory search on Westlaw reveals Mr. Straw to be a prolific if unsuccessful litigator. He is identified as a plaintiff in over fifty judicial opinions . . . [n]otably, the Indiana Supreme Court disciplined Mr. Straw in 2017 for filing frivolous cases, suspending his law license for 180 days. It appears that plaintiff’s Indiana law license remains suspended.”) (citations omitted).

Accordingly, Plaintiff’s Motion for Rule 11 Sanctions should be denied.

DATED this 1st day of September, 2023.

Respectfully submitted,

BRIAN BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division

J. PATRICK GLYNN  
Director, Torts Branch  
Environmental Torts Litigation Section

BRIDGET BAILEY LIPSCOMB  
Assistant Director, Torts Branch  
Environmental Torts Litigation Section

ADAM BAIN  
Senior Trial Counsel, Torts Branch  
Environmental Torts Litigation Section

HAROON ANWAR  
ELIZABETH PLATT  
ALLISON M. O'LEARY  
CINDY M. HURT  
Trial Attorneys, Torts Branch  
Environmental Torts Litigation Section

/s/ Patrick J. Ryan  
PATRICK J. RYAN  
Trial Attorney, Torts Branch  
Environmental Torts Litigation Section  
U.S. Department of Justice  
P.O. Box 340, Ben Franklin Station  
Washington, D.C. 20044  
E-mail: Patrick.J.Ryan@usdoj.gov  
Telephone: (202) 307-5842  
Fax: (202) 616-4473

Attorney inquiries to DOJ regarding the  
Camp Lejeune Justice Act:  
(202) 353-4426

**CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2023, a copy of the foregoing United States' Opposition to Plaintiff's Motion for Rule 11 Sanctions filed and served through the Court's ECF system.

/s/ Patrick J. Ryan  
PATRICK J. RYAN